

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604

DATE: NOV 13 2014

SUBJECT: INSPECTION REPORT – West Bay Exploration Co, Jackson County, Michigan

Facility: Hilden-Rovsek 16 Facility, Norvell Township

FROM: Natalie Topinka, Environmental Scientist
AECAS (IL/IN)

THRU: Nathan Frank, Chief
AECAS (IL/IN)

TO: File

Date of Inspection: August 28, 2014

Attendees: Natalie Topinka, Environmental Scientist, U.S. EPA
Kristy Shimko, Geologist, Office of Oil, Gas and Minerals, MDEQ
Terry R. Pelham, Production Foreman, West Bay Exploration

Purpose of Inspection: The purpose of conducting an inspection of West Bay Exploration Company's Jackson County operations was to assess compliance with the Michigan State Implementation Plan and any applicable air permits.

Company Description and Background:

Location: Approximately 9439 Case Rd, Brooklyn, MI 49230
(Lat: 42.121482, Long: -84.198877)

Primary Contact: Terry R. Pelham, Production Foreman

West Bay Exploration Company (West Bay) has headquarters in Traverse City, Michigan, with operations in several states including Michigan, Texas, Oklahoma, and North Dakota. The company employs 20 people and many more contractors and lease operators.

Opening Conference

I arrived at the Hilden-Rovsek 16 CPF at 3:10 with Ms. Shimko of MDEQ and Mr. Pelham of West Bay. We had all come directly from inspecting another West Bay facility so introductions were made previously. The following information was obtained verbally from Mr. Pelham during the inspection and in subsequent clarifying correspondence.

Hilden-Rovsek 16 CPF Facility Overview

The Hilden-Rovsek facility accepts product from four wells; there are four heater-treaters on-site. The heater treaters separate the emulsion of oil, gas, and water by applying heat from a gas-fired burner. The components of the emulsion separate into layers according to density and can then be drawn off individually. Gas is sent to a main Panhandle Eastern Pipeline Company pipeline to be transported to the nearby Haystead (also owned by West Bay) natural gas processing facility for compression and further refinement, while oil and brine are piped to separate on-site storage tanks. There are six 400-barrel tanks for oil and brine storage. Oil and brine are transported off-site by truck. There is no vapor recovery unit (VRU). The flare receives vapors from tanks, truck venting during loading, and/or emergency/overload conditions.

Facility Tour

I took some photos of the overall facility (see photos section) and viewed the flare with the IR camera (a FLIR GF320). No visible emissions (with the naked eye) from the flare were present at that time. I climbed the stairway of the tank battery and viewed each of the thief hatches with and without the IR camera. There was a noticeable petroleum odor along the walkway. The IR camera showed all the thief hatches leaking continuously (see IR Video Log and diagram).

I pointed out my observations to Mr. Pelham and he made note of the leaking thief hatches. He stated that West Bay's plan was to inspect every one of the company's thief hatches and install heavier hatch cover weights. Mr. Pelham stated that there was no disadvantage to installing a 14 ounce weight versus the 6 or 8 ounce weights that were presently used on West Bay's thief hatches.

Closing

I shared my observations with Mr. Baker and Mr. Pelham regarding which tank hatches were leaking. Mr. Pelham did not claim any information as confidential business information. Mr. Pelham, Ms. Shimko, and I agreed to caravan to another West Bay facility nearby. We departed the Hilden-Rovsek facility at approximately 3:35 pm.

Photos



1) Flare



2) Flare, showing lit.

IR Video Log

Video ID number	Description
MOV_0735.mp4	Flare
MOV_0736.mp4	Leaking thief hatch
MOV_0737.mp4	Leaking thief hatch
MOV_0738.mp4	Leaking thief hatch
MOV_0739.mp4	Leaking thief hatch
MOV_0740.mp4	Leaking thief hatch
MOV_0741.mp4	Leaking thief hatch



Image: Google Maps

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